

February 7, 2003

CERTIFIED MAIL #9058 7807

Jack Taylor  
Operations Manager  
AGA Gas Central  
3930 Michigan Avenue  
Hammond, Indiana 46323

Dear Mr. Taylor:

Re: State Exempt Status (089-16973-00475)

The information requested from AGA Gas Central, initially received on December 23, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1-2 for State Registrations, it has been determined that the Painting and Shot Blasting operations at the source is classified as being exempt from the air pollution permit requirements of the IDEM. However, the source will still be permitted by HDEM under the Hammond Air Quality Control Ordinance 7102, as it has been in the past.

Any change or modification which may create or increase potential emissions of any criteria pollutant from the equipment covered in this exemption must be approved by the Hammond Department of Environmental Management (HDEM) before such change may occur.

If you should have any questions concerning the above, please feel free to contact Debra Malone at (219) 853-6306.

Sincerely,

Ronald Novak, Director  
Hammond Department of Environmental Management  
Air Pollution Control Division

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Hammond Department of Environmental Management  
Air Pollution Control Division**

**Technical Support Document (TSD) for an Exemption**

**Source Background and Description**

**Source Name:** AGA Gas Central  
**Source Location:** 3930 Michigan Avenue, Hammond  
**County:** Lake  
**SIC Code:** 2813  
**Operation Permit No.:** 089-16973-00475  
**Permit Reviewer:** Kristina Massey

The Office of Air Quality (OAQ) has reviewed an application from AGA Gas Central relating to the operation of the painting and shot-blasting operation. At this time the Company has fallen below registration thresholds because a request was made to remove the paint booth from the permitting process. The paint booth is used for storage of cylinders, and has not been used to paint the cylinders in more than two years. The shot-blaster does not meet the thresholds of a registration on its own, therefore a registration does not apply to AGA Gas Central.

The Company will receive a local permit pursuant to Hammond Air Quality Control Ordinance 7102 for the shot-blasting process.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	3.504
PM-10	3.013
SO <sub>2</sub>	0
VOC	0
CO	0
NO <sub>x</sub>	0

The potential to emit (as defined in 326 IAC 2-7-1(29)) of Particulates is less than 5 tons per year (2-5.1-2 Registration) therefore an exemption letter will be issued. Pursuant to Hammond Air Quality Control Ordinance 7102 and 3522 (as amended) a local Operation Permit will be issued.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 emissions

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	0
SO <sub>2</sub>	0
VOC	0
CO	0
NO <sub>x</sub>	0
HAP (specify)	0

The Company did not run either of the permitted facilities in 2001.

### County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate nonattainment
SO <sub>2</sub>	Primary nonattainment
NO <sub>2</sub>	Attainment/unclassifiable
Ozone	Severe, nonattainment
CO	Attainment/unclassifiable
Lead	Attainment/unclassifiable

Lake County has been classified as nonattainment for PM and PM10 emissions. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

### Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.035
PM10	0.030
SO <sub>2</sub>	0
VOC	0
CO	0
NO <sub>x</sub>	0

This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year, and it is not in one of the 28 listed source categories.

## **Part 70 Permit Determination**

### **326 IAC 2-7 (Part 70 Permit Program)**

This existing source, including the emissions from this permit, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the HDEM.

## **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

## **Conclusion**

The Company will receive an exemption letter and local Operation Permit for the shot-blasting process.

## ALABAMA POWER LAW (CDS)/EIS CALCULATIONS

Appendix A

AGA Gas Central  
3930 Michigan Avenue  
Hammond, IN 46323

PLANT ID NO: 475  
INSP DATE: 11/13/01  
CALC DATE: 1/22/02

CALCULATIONS BY: Kristina Massey

YEAR OF DATA: **2001**NO. OF POINTS: 1

EF: EMISSION FACTOR  
CE: CONTROL EFFICIENCY

MDR: MAXIMUM DESIGN RATE  
MDC: MAXIMUM DESIGN CAPACITY

Ts: STACK DISCHARGE TEMPERATURE  
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

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**LSI Shotblaster (SB-1)**

MDR (T/hr): 0.1000  
YEARLY PROD (T/yr): 0

STACK ID (DIAM:HEIGHT): (0.67': 15')  
FLOWRATE (ACFM): 2000  
Ts(°F): 80

CNTRL DEV: LSI Dust Collector (DC-1)

PERMITTED OPERATING HRS: **8760** hr/yr

SCC #3-09-002-05			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	8	0.99	0.8000	19.2000	<b>3.5040</b>	0.0080	0.0350	0.0005	0.0080	0.0350	0.0000	0.0000
PM10	6.88	0.99	0.6880	16.5120	<b>3.0134</b>	0.0069	0.0301	0.0004	0.0069	0.0301	0.0000	0.0000
SOx	0	0	0.0000	0.0000	<b>0.0000</b>	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
NOx	0	0	0.0000	0.0000	<b>0.0000</b>	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
VOC	0	0	0.0000	0.0000	<b>0.0000</b>	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
CO	0	0	0.0000	0.0000	<b>0.0000</b>	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000
LEAD	0	0	0.0000	0.0000	<b>0.0000</b>	0.0000	0.0000	N/A	0	0.0000	0.0000	0.0000

EF for PM = 0.004 lb PM/ lb abrasive = 8 lbs/T

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Hammond Air Quality Control Ordinance #3522 (as amended)

EF for PM10 = 0.86 lb PM10/ lb PM

The unit is intermittantly operated for cleaning cylinders at a maximum of once per week.

MDR = initial load of shot into blaster is 200 lbs (0.1 tons) and a maximum loading of shot of once per hour